

Our ref. HGN105/55972/VP

T: +44 (0)8449 02 03 04
F: +44 (0)161 956 4009

Date: 21 October 2019

avisonyoung.co.uk

Chief Planning Officer
London Borough of Hillingdon
Civic Centre
High Street
Uxbridge
Middlesex
UB8 1UW

Submitted via the Planning Portal

Dear Sir or Madam,

PRIOR APPROVAL APPLICATION FOR THE UPGRADE OF AN EXISTING SITE, COMPRISING THE REMOVAL AND REPLACEMENT OF 4NO. EXISTING ANTENNAS WITH 12NO. UPGRADED ANTENNAS LOCATED ON NEW SUPPORT POLES TO BE FIXED TO THE EXISTING 'PIGPEN' STEELWORK, THE REMOVAL AND REPLACEMENT OF 4NO. EXISTING EQUIPMENT CABINETS WITH 8NO. UPGRADED EQUIPMENT CABINETS LOCATED ON THE PLANT ROOM ROOFTOP, AND ANCILLARY DEVELOPMENT THERETO, AT HEATHROW CAR PARK, HEATHROW TERMINAL 2, HAYES, HILLINDON, LONDON, UB3 5AP

We are planning consultants retained by MBNL to submit planning applications on their behalf. This proposal is for the upgrade of the existing H3G (Hutchison 3G UK Limited) site.

Enclosed you will find a GPDO planning application prepared on behalf of H3G. They have been licensed to provide a Cellular Network based upon the Global System for Mobile (GSM) standard and Universal Mobile Telecommunications System (UMTS) within the United Kingdom.

The development consists of:

"The removal and replacement of 4No. existing antennas with 12No. upgraded antennas located on new support poles to be fixed to the existing 'pigpen' steelwork, the removal and replacement of 4No. existing equipment cabinets with 8No. upgraded equipment cabinets located on the plant room rooftop, and ancillary development thereto."

Enclosed is the following:

- Drawings No. 1098573 – 002, 100, 150, 215, 265 – B
- Application forms
- Supplementary Site Specific Information
- Planning Statement (including design and access statement)
- ICNIRP certificate
- Mobile UK Councils and Connectivity document
- 5G and Future Technology document
- Connected Growth Manual – Digital Infrastructure document

Avison Young is the trading name of GVA Grimley Limited registered in England and Wales number 6382509. Registered office, 3 Brindleyplace, Birmingham B1 2JB

Regulated by RICS

The requisite fee of £462 will be paid via the Planning Portal service.

We trust you will find the enclosed information sufficient to register and validate the application. If however you require any further information,

please contact Victoria Parsons on 0161 956 4123 or victoria.parsons@avisonyoung.com.

Yours sincerely

A handwritten signature in black ink that reads "V. Parsons". The signature is written in a cursive, slightly slanted style.

Victoria Parsons
Planner, Telecoms
Avison Young
For and on behalf of H3G UK Limited and EE Limited

1.1 HISTORY & BACKGROUND

Everything Everywhere is a 50-50 joint venture between Deutsche Telekom and France Télécom and was formed in 2010 through the merger of the T-Mobile (UK) and Orange U.K. businesses.

On 3 September 2010, Everything Everywhere announced that Orange would join Mobile Broadband Network Ltd (MBNL), the joint venture management company formed in December 2007 between T-Mobile UK Ltd and Hutchison 3G UK Ltd (H3G UK).

In 2016, Everything Everywhere were chosen to work in conjunction with the Home Office to deliver the Emergency Services Network (ESN), which will deliver a smarter, better and cheaper communications capability.

This application upgrades the existing equipment.

1.2. DESIGN

1.2.1. The proposal

The host site is a Rooftop site located at Heathrow Car Park, Heathrow Terminal 2, Hayes, Hillingdon, London, UB3 5AP. The proposed work comprises the removal and replacement of 4No. existing antennas with 12No. upgraded antennas located on new support poles to be fixed to the existing 'pigpen' steelwork, the removal and replacement of 4No. existing equipment cabinets with 8No. upgraded equipment cabinets located on the plant room rooftop, and ancillary development thereto.

As the scheme proposes new support poles on a building over 15 metres in height, a prior approval application is required.

1.2.2. Design Considerations

The proposed upgrade utilises an existing site where possible. The operator has identified a requirement in this area to upgrade the equipment, to provide 5G coverage. The ability to upgrade the existing equipment ensures that a new site is not required in the immediate vicinity.

The proposed 12 upgraded antennas will be located on new support poles fixed to existing steelwork on the rooftop, which is necessary as the existing pole mounts are not structurally capable of holding the upgraded antennas. Due to ICNIRP clipping issues on the building and the use of larger antennas, the overall height of the apparatus is required to be increased to 25.48 metres – an overall increase of 2.53 metres. The CAA and Heathrow Airport have been consulted with. No responses have been received. We do not consider that the proposal will have a detrimental visual impact given the commercial nature of the area; the equipment will be viewed in the context of the airport and car park. Additionally, there are taller structures nearby and therefore the small increase in height is not considered to impact on the operational integrity of the airport.

The proposal is for the upgrade of an existing established rooftop site. The scheme proposes the minimum amount of equipment required to allow for the upgrade of the site. It is not considered that the proposal will have a detrimental impact on the area, and permission should not be withheld.

1.2.3 Siting

The site is located on the rooftop of Heathrow Terminal 2 Car Park. The replacement antennas will be slightly taller than the existing infrastructure; however, it is considered that the overall impact of the proposed equipment will not be visually prominent given that the site is viewed in the context of the airport. The proposal will allow for 5G coverage to be provided to the very busy Heathrow Airport and surrounding areas.

1.2.4. Planning Policy Considerations

Section 54A of the Town and Country Planning Act 1990 (as amended)(now section 38 (6) of the Planning and Compulsory Purchase Act 2004) states that Local Planning Authorities should determine proposals in accordance with development plan policies, unless material considerations indicate otherwise. Material considerations may include, inter alia, central government guidance, High Court and Inspector's decisions etc.

1.2.5. Local Policy

Hillingdon Local Plan: Part 1 – Strategic Policies (Adopted November 2012)

The Local Plan: Part 1 contains Strategic Objectives for the Strategy for the Heathrow Opportunity Area. In particular, **SO24** and **SO25** are relevant. The proposal is for the upgrade of the existing telecommunications equipment to provide 5G coverage. The improved coverage will ensure that the area in and around Heathrow Airport is at an economic advantage, and will encourage businesses to enter/stay in the area. It will also benefit local residents who use a mobile phone.

Hillingdon UDP Saved Policies (September 2007)

Policies were saved beyond September 2007. **Policy BE37: Telecommunications** is relevant in the determination of this application. In relation to (i), the site is required to provide 5G coverage to the nearby area. In relation to (ii), (iii) & (iv), the proposal is for the upgrade of an existing telecommunications site which utilises an existing building. The site is shared by EE Limited and H3G UK Limited. In relation to (v), the appearance of the townscape will not be seriously harmed as the proposal is for the upgrade of an existing site which is viewed in the context of the airport and will propose only a minimum increase in height.

Local Plan Part 2 – Development Management Policies (October 2015) – not yet adopted

As this document is not yet adopted it holds limited weight. It contains **Policy DMHB 21: Telecommunications** which is relevant in the determination of this application. Much of the policy is covered in the above paragraph; however in relation to (iv) the site is not located in an area of ecological interest, landscape importance, archaeological site, Conservation Area or on a building or architectural or historic interest. In relation to part (v), an ICNIRP certificate is submitted as part of this application to confirm that the proposal complies with International guidelines.

London Plan 2017

The current 2016 Plan is still the adopted Development Plan, but the Draft London Plan is considered to be a material consideration in planning decisions and holds limited weight in the determination of applications.

The 2016 Plan recognises the strategic importance of providing the necessary infrastructure, including modern communications networks that London requires to secure its long – term economic growth.

The Draft London Plan contains Paragraph 1.0.8 which states “Planning for a ‘smarter’ city, with world-class digital connectivity will enable secure data to be better used to improve the lives of Londoners.” The upgraded equipment will provide enhanced digital connectivity which is of a public benefit to both Londoners and visitors to the area.

Paragraph 1.4.11 states “The digital economy, underpinned by world-class digital connectivity, data and digital services is of ever-increasing importance, improving processed, opening up new markets and allowing more flexible working.” The upgraded site will ensure that the level of connectivity in the area is sufficient to meet the rising demand of reliable data and digital services required by the public.

Policy SI6 – Digital connectivity infrastructure is split into 4 parts. In relation to the proposed installation the following parts are relevant:

3A) The upgraded site will ensure that there will be no reduction in mobile connectivity in the surrounding area as the existing level of coverage will be improved and 5G coverage will be provided.

The site will be an integral element in securing the Mayor's vision for the delivery of modern communications networks across London.

London Infrastructure Plan 2050 – Update

Chapter 8 – Digital connectivity states that digital connectivity is vital and essential for businesses and citizens to take part in modern society. The upgraded site will allow for a sufficient level of connectivity, thus keeping businesses and citizens at a technological advantage.

National Infrastructure Commission Report – Connected Future

The National Infrastructure Commission (NIC) was asked to advise government on the steps the UK should take in order to become a world leader in the deployment of 5G mobile telecommunications networks, and ensure that the UK can take early advantage of the applications those networks may enable.

The Commission's central finding is that mobile connectivity has become a necessity. The market has driven great advances since the advent of the mobile phone. But Government must now play an active role to ensure that basic services are available wherever we live, work and travel, whilst our roads, railways and city centres must be made 5G ready as quickly as possible.

Recommendation 4: states,
“Local Government should actively facilitate the deployment of mobile telecoms infrastructure”.

This proposal is part of the mobile network and is required to provide continued reliable mobile coverage and connectivity in this busy London location.

Paragraph 3.4

“These issues need to be addressed to enable widespread provision and adoption of various future services in the UK, with high quality mobile access where people live, work and travel. Addressing coverage issues now will provide the infrastructure platform on which successive generations of mobile technology will sit, be they 5G, 6G or next generation Wi-Fi.”

This upgraded site is an import part of this ethos and will provide good 5G mobile coverage where people work, travel and spend leisure time.

1.2.6. National Policy

National Planning Policy Framework

This legislation was formally adopted in July 2018, and updated in February 2019, and replaces the previous version which was introduced in 2012.

In relation to this policy the following sections are relevant in determining this application:

Section 6 – Building a strong, competitive economy

Section 10 – Supporting high quality communications

Section 12 – Achieving well-designed places

The following paragraphs need to be considered in relation to this policy:

Paragraph 80 – “significant weight should be placed on the need to support economic growth and productivity... this is particularly important where Britain can be a global leader in driving innovation.”

Paragraph 112 – “Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections.”

In relation to these paragraphs, the Government's Industrial Strategy sets out a vision to drive productivity improvements across the UK, and sets out a delivery programme to make the UK a leader in “artificial intelligence and big data”. The improvement of telecommunications capacity is imperative to allow for areas to be connected, and is essential for economic growth. The proposed upgrade will allow for the provision of 5G coverage in the area.

Paragraph 113 – “Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged.”

In relation to this paragraph, no alternative sites were considered as the proposal is for the upgrade of an existing site which utilises an existing building.

Paragraph 114 – “Local planning authorities should not impose a ban on new electronic communications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of electronic communications development, or insist on minimum distances between new electronic communications development and existing development. They should ensure that:

- a) They have evidence to demonstrate that electronic communications infrastructure is not expected to cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and
- b) They have considered the possibility of the construction of new buildings or other structure interfering with broadcast and electronic communications services.”

Paragraph 115 – “Applications for electronic communications development (including applications for prior approval under the General Permitted Development Order) should be supported by the necessary evidence to justify the proposed development. This should include:

- a) The outcome of consultations with organisations with an interest in the proposed development, in particular with the relevant body where a mast is to be installed near a school or college, or within a statutory safeguarding zone surrounding an aerodrome, technical site or military explosives storage area; and
- b) For an addition to an existing mast or base station, a statement that self-certifies that the cumulative exposure, when operational, will not exceed International Commission guidelines on non-ionising radiation protection; or
- c) For a new mast or base station, evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure and a statement that self-certifies that, when operational, International Commission guidelines will be met.

In relation to this paragraph, the site is not located near a school or college. A letter has been sent to Heathrow Airport and the CAA – no responses have been received. Additional consultation was carried out with Councillors Milani, Money and Nelson; no responses were received. An ICNIRP certificate is included as part of the application to confirm that the proposal complies with International guidelines. No alternative sites have been considered as the proposal is for the upgrade of an existing site.

Paragraph 124 – “Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”

In relation to this paragraph, the proposal is for the upgrade of an existing site located on an existing building. It is not considered that the proposal will have a detrimental impact on the surrounding communities as the minimum amount of equipment has been proposed.

1.2.7 Site Need and Identification

The proposal is to upgrade an existing site; therefore no alternative sites were considered as the proposal has very little visual impact on the area.

In addition to the above, the site will form part of an improved upgraded network for H3G & EE, which will allow faster downloading and the reduction in call drop outs.

Coverage - The licence granted to H3G & EE demands that strict coverage qualities are met. It is essential that the benefits of mobile telephones are available for all the population. The changing customer use of mobile phones also demands that networks and coverage is available at home, in the workplace, while shopping, enjoying leisure activities or while on the move. The site will provide 5G coverage to the area.

Quality - In order to ensure coverage within buildings such as homes, shops, offices etc. the radio signal has to be of sufficient strength to penetrate walls. In urban and suburban areas a dense network of base stations is therefore required, some less than 1km apart.

Capacity - As the use of and demand for mobile phones has increased the number of sites required to provide Network capacity has increased. Each cell or base station can only handle a finite number of calls so in areas of high use additional cells are required to meet demands on the network and thus avoid existing cells going into congestion.

The radio implication of the site: Radio signals are transmitted through the network by using fixed links at such frequencies that necessitate an uninterrupted line of sight. To achieve this, the installation must reach a sufficient height above surrounding buildings and trees. The installation must also be in a position to provide good in building radio coverage to the target area.

The planning tool identifies deficiencies in the network and predicts the location from which the optimum coverage will be provided. This area is referred to as the search area or cell centre.

It is for these reasons that it is important to achieve a service of quality for mobile users. The main complaints received by mobile telephone operators about their service relate to the problems associated with dropped calls and no service. As more and more people are using tablets and smart phones there is a need to ensure that existing sites can meet this demand. This is one such site as due to the location of the site there is a high level of traffic to the site.

1.2.8 Health and Safety

The proposal for this site has been designed within International Commission on Non-Ionising Radiation Protection (ICNIRP) public exposure guidelines and therefore Health and Safety concerns should not be a planning consideration.

An ICNIRP certificate is not required as part of this application as the proposal is for the replacement of an existing equipment cabinet only, which will not alter ICNIRP levels.

2 CONSULTATION

A letter has been sent to Heathrow Airport and the CAA – no responses have been received. Additional consultation was carried out with Councillors Milani, Money and Nelson; no responses were received.

3 CONCLUSION

This is an upgrade of an existing site; it is not considered that the proposal will have a noticeable impact on the area. The site is viewed in the context of the airport.

We hope the above information is sufficient for you to consider this application favourably.